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REMARKS

On March 22, 2007, at about 9:30 a.m., the undersigned had a telephone conference with SPE Michael Barr. At that time, the undersigned indicated that no rejection to date had considered all of the dependent claims and that it was believed that the rejection of the independent claims was incomplete. Further, it was noted that the final rejection seemed to only differ from the original rejection in that saying that all of the dependent claims were inherently shown by the reference. To the contrary, for example, dependent claims cover both hydrophilic and hydrophobic embodiments and, therefore, inherency is impossible. SPE Barr indicated that a response should be filed showing why the reference does not teach each of the dependent claims.

Claim 1 calls for attaching ligands along a polymer bristle to form a semiconductor wafer cleaning brush. The cited reference to Wang teaches an ion exchange resin pad in the form of one or more sheets. See column 12, lines 37-44. Thus, at the least, Wang fails to teach attaching ligands along a polymer bristle, at least because there is no polymer bristle. Therefore, reconsideration is requested.

Claim 2 is not specifically addressed, but there is no suggestion in the reference of using hydrolysis reaction. In fact, the reference is devoid of any mention of a hydrolysis reaction involving ligands, as far as can be determined. Thus, the assertion of inherency is not understood since there are many reactions that could be used, the reference does not even talk about ligands, and does not even talk about hydrolysis reactions.

Claim 3 calls for attaching ligands along a polyvinyl alcohol polymer. The reference does not seem to have any ligands or any polyvinyl alcohol polymer. There are lots of different polymers and there is no way that the claim could be inherently taught by the reference since, in order to be inherent, the feature must necessarily be present.

Claim 4 calls for using a coupling agent to attach ligands along a polymer chain. The office action does not address the claim, but simply now says that the element is inherent. It is not believed that it would need to be inherent since there are many different ways to attach ligands, the reference does not even talk about ligands, and certainly mentions nothing about using any coupling agent.

Claim 5 covers attaching ligands to provide a hydrophilic property. The rejection does not mention the claim specifically. Such a property is not suggested in the reference in any place

that can be identified. Moreover, this claim talks about making a hydrophilic character and claim 6 calls for a hydrophobic. If this claim is inherently met then, necessarily, the reference must use a hydrophilic reaction. As a result, claim 6 would have to be allowed. To the contrary, it appears that there is no basis for an inherency rejection since there are at least two different options, both hydrophilic and hydrophobic.

Claim 6 calls for a hydrophobic property and no such hydrophobic property can be found in the reference. For the reasons set forth above with respect to claim 5, the rejection based on inherency cannot fly.

Claim 7 calls for attaching ligands to provide a reducing agent property. No such property is suggested in the reference, nor are ligands described.

Claim 8 calls for attaching ligands to provide an oxidizing property. Again, neither ligands or an oxidizing property are suggested.

Claim 9 calls for attaching ligands to provide an attraction to a specific material. No such ligands are described in the reference.

Claim 10 calls for attaching ligands to change the zeta potential. The reference does not even talk about the zeta potential.

Claim 11 calls for attaching a ligand having a subchain to the polymer. There is no discussion of ligands or subchains in the reference that can be identified.

Claim 12 calls for attaching a moiety to said subchain to provide a desired property. Since there are no subchains, the reference cannot possibly teach claim 12.

For the same reasons, the rejections of claims 13-23 fail to make out a *prima facie* case, fail to adequately address the elements of the claims, and fail to set forth a proper inherency rejection.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,



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